

**O'NEILL / HASSEN****MEMORANDUM ENDORSED**

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Attorneys at Law

December 17, 2020

VIA ECF

Honorable Gregory H. Woods  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *United States v. Lorry Gonzalez*, 20 cr. 425 (GHW)

Dear Judge Woods:

I am writing to request that the Court modify the conditions of Ms. Gonzalez's bail. We are first requesting that her ankle bracelet be removed. As the Court is aware, Ms. Gonzalez is a single mom to a severely autistic child and the location monitoring device can be a hinderance to her basic tasks. Ms. Gonzalez also request the Courts permission to go on two separate day trips to visit her sisters in Pennsylvania during the next two weeks. She would coordinate these trips with probation and abide by all COVID-19 restrictions. The government consents to both of these modifications.

I thank the Court in advances for its consideration of this request and hope all parties are safe and healthy during this holiday season and beyond.

Application granted in part and denied in part. Defendant's request to remove her ankle bracelet is denied. Ms. Gonzalez may take two separate day trips to visit her sisters in Pennsylvania. Ms. Gonzalez is directed to inform her pretrial services officer when she departs for, and returns from, each of those two day trips.

Respectfully submitted,

/s/


The Clerk of Court is directed to terminate the motion pending at Dkt. No. 18.

Grainne E. O'Neill  
*Attorney for Lorry Gonzalez*

SO ORDERED

December 18, 2020

cc: a

  
GREGORY H. WOODS  
United States District Judge